REMARKS

Claims 21-39 are pending in this application.

The Examiner has rejected claims 21-28, 30, and 36-39 under 35 U.S.C. § 102(e) over Baker; rejected claims 29 and 31-33 under 35 U.S.C. § 103(a) over Baker and Sullivan; and rejected claims 34-35 under 35 U.S.C. § 103(a) over Baker and Traversat. Applicants respectfully traverse these rejections.

Applicants' techniques are directed to inserting a graphic onto a drawing page of a drawing software module. The drawing software module is configured to access a local graphic library by default. A user configures the drawing software module to access an enterprise graphic library and/or a public graphic library in addition to this local graphic library. The enterprise graphic library and the public graphic library are both remote from the user's computer. In some embodiments, the enterprise graphic library includes content that is transferred to it from the public graphic library.

Under applicants' techniques, to locate a desired graphic, a user enters a search term that describes the graphic. In addition, the user selects whether to search the local graphic library, a remote graphic library, or both. Applicants' techniques identify one or more graphics that match the search term in the appropriate graphic library or libraries. For example, if the user has selected to search a remote graphic library and the drawing software module has been configured to access the enterprise graphic library, applicants' techniques identify one or more graphics in the enterprise graphic library that match the search term. If the user has selected to search a remote graphic library and the drawing software module has been configured to access the public graphic library, applicants' techniques identify one or more graphics in the public graphic library that match the search term. In addition, if the user has selected to search the local graphic library, applicants' techniques identify one or more graphics in the local graphic library that match the search term. Applicants' techniques display metadata associated with

the identified graphics to the user, and allow the user to select one of the identified graphics for insertion onto a drawing page of the drawing software module.

Baker describes searching databases for items that are indexed by multiple keywords. A user enters a search term that describes items, such as graphics, that the user wishes to find. Baker matches the entered search term to a keyword tree that contains the keywords recognized by its system. When a match is found, Baker consults a database local to the user's computer to determine if the items matching the keyword are cached on the user's computer. If so, the matching items are presented to the user. If not, Baker sends the keyword to a remote server, retrieves the matching items from the remote server, and presents these matching items to the user. The retrieved matching items are compared with the local database. Any items already cached in the local database are not downloaded to the user's computer, while the remaining items are downloaded to the user's computer and become part of the local database.

Claims 21-29 recite three different graphic libraries – an enterprise graphic library, a public graphic library, and a local graphic library. In contrast, Baker describes only two databases – a local database and a remote server. While Baker describes that a remote server may be divided into different collections, such as based on subject matter, image resolution, or other criteria (Baker, ¶ [0056]), Baker still only describes one remote database that is divided into different collections. Even if Baker's collections were to be stored in different remote databases, claims 21-29 also recite that applicants' "enterprise graphic library … includes content transferred from a public graphic library." That is, one of applicants' remote graphic libraries – its enterprise graphic library – includes content transferred from another of applicants' remote graphic libraries – its public graphic library. Baker does not disclose that one of its remote collections "includes content transferred from" another remote collection, as would be required to correspond to applicants' techniques.

The Examiner cites Baker at paragraphs [0033] and [0052] as disclosing applicants' "maintaining on a local-area network an enterprise graphic library that includes content transferred from a public graphic library accessible via a wide-area network to the enterprise graphic library," as recited by claims 21-29. In particular, the Examiner cites Baker's "[l]ocal database management [module] stores and manages the data downloaded by the download/upload module." (Office Action, July 23, 2008, p. 3.) The cited portions of Baker describe that a local database management module, or "caching module," stores or caches keyword lists and items, such as graphics, downloaded by Baker's download/upload module from a remote server. That is, Baker stores recently accessed items from the remote server in a cache on the user's computer. One skilled in the art would not understand a cache to be equivalent to applicants' graphic library, as recited. A cache is simply a memory for storing a copy of items that have recently been retrieved or accessed, while a graphic library is an organized collection of computer graphics. Baker does not disclose "an enterprise graphic library that includes content transferred from a public graphic library accessible via a wide-area network to the enterprise graphic library," as recited.

Claims 21-29 also recite "wherein the enterprise graphic library and the public graphic library are both remote from the computer." The Examiner cites Baker at paragraph [0035] as disclosing this recited feature. In particular, the Examiner believes that Baker's local database corresponds to applicants' enterprise graphic library and that Baker's remote server corresponds to applicants' public graphic library. (Office Action, July 23, 2008, p. 3.) The cited portion of Baker describes that a client first searches its own local database for a match between a user's search term and a keyword in the local database. If a matching keyword is found, the client determines whether the matching items are located in the local database. Matching items in the local database are presented to the user. Matching items not in the local database are retrieved from a remote server and presented to the user. Unlike applicants' techniques, however, Baker's local database is not "remote from the [user's] computer,"

as recited. As the name "local database" implies, Baker's local database is local to the user's computer. Baker does not disclose "wherein the enterprise graphic library and the public graphic library are both remote from the computer," as recited.

Claims 21-29 also recite "configuring by a user the drawing software module to access the enterprise graphic library, the public graphic library, or both in addition to the local graphic library the drawing software module is configured to access by default." The Examiner cites Baker at paragraph [0035] as disclosing this recited feature. In particular, the Examiner cites Baker's "client computer perform[s] a search in the local database and the server." (Office Action, July 23, 2008, p. 3.) As described above, the cited portion of Baker describes that a client first searches its own local database for a match between a user's search term and a keyword in the local database. If a matching keyword is found, the client determines whether the matching items are located in the local database. Matching items in the local database are presented to the user. Matching items not in the local database are retrieved from a remote server and presented to the user. The cited portion of Baker does not disclose anything that corresponds to applicants' "configuring by a user," not to mention "configuring by a user the drawing software module to access the enterprise graphic library, the public graphic library, or both in addition to the local graphic library the drawing software module is configured to access by default," as recited. The only user interaction described by Baker is the entry of a search term by the user; Baker's user does not configure a drawing software module to access remote databases that the drawing software module is not configured to access by default.

Claims 21-29 also recite "inserting the selected graphic onto the drawing page of the drawing software module." Claims 30-39 recite "inserting the selected graphic onto the drawing page of the drawing software program from the graphic database in which the graphic was identified." The Examiner cites Baker at paragraph [0059] as corresponding to this recited feature. In particular, the Examiner cites Baker's "data

received from the remote server is stored in the local computer." (Office Action, July 23, 2008, p. 5.) The cited portion of Baker describes that, once a matching keyword is found, a local database is checked for representations (e.g. thumbnail images) of matching items. If representations of matching items are found in the local database, these representations are presented to the user. If not, representations of matching items are retrieved from the remote server, presented to the user, and cached in the local database on the client computer. Once the representations have been presented to the user, Baker determines whether the user wants to download an item that has been presented. If so, the local database is checked to see if it contains the requested item. If the local database contains the requested item, the item is presented to the user; otherwise, the item is requested and retrieved from the remote server. An item received from the remote server is cached in the local database on the client computer.
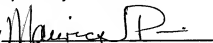
As described above, the Examiner previously indicated that Baker's local database corresponds to applicants' enterprise graphic library. The Examiner cannot now maintain that Baker's local database corresponds to applicants' drawing software module, which is separate from applicants' enterprise graphic library. Even if the Examiner were permitted to now compare Baker's local database to applicants' drawing software module, Baker's local database does not so correspond. The cited portion of Baker describes caching an item retrieved from a remote server in a local database. The cited portion describes nothing that corresponds to "inserting the selected graphic onto the drawing page of the drawing software module," such as inserting an item onto an electronic page in a drawing software program, as recited.

Based upon the above remarks, applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

Please charge any deficiencies or credit any overpayment to our Deposit Account No. 50-0665, under Order No. 418268834US from which the undersigned is authorized to draw.

Dated: _____October 23, 2008_____

Respectfully submitted,

By _____
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